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Counsel for the Liquidating Trustee

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

In re:

FRONTIER STAR, LLC, ☐
FRONTIER STAR CJ, LLC, ☐
FRONTIER STAR 1, LLC, ☐
MIH ADMIN SERVICES, LLC, ☐

Debtors.

Chapter 11

Case No. 2:15-bk-09383-EPB

Jointly Administered with:

2:15-bk-09385-EPB

2:15-bk-14679-EPB

2:15-bk-14682-EPB

This filing applies to:

- ☒ All Debtors
☐ Specified Debtors

**NOTICE OF ERRATA TO
LIQUIDATING TRUSTEE'S FIRST
OMNIBUS OBJECTION TO GENERAL
UNSECURED CLAIMS**

Hearing Date: TBD

Hearing Time: TBD

P. Gregg Curry, as Liquidating Trustee of the Frontier Liquidating Trust (the "Trustee"), hereby submits errata to the *Liquidating Trustee's First Omnibus Objection to General Unsecured Claims* [DE #1539] filed on September 19, 2017 (the "First Omnibus Objection").¹ Exhibit A to the First Omnibus Objection sets forth the Trustee's objections to various Disputed Claims. On page A-26 of Exhibit A to the First Omnibus Objection, creditor Vestar California

¹ Capitalized terms not defined herein shall have the meanings set forth in the First Omnibus Objection.

XXII, L.L.C. is mistakenly referred to as Vestar Arizona XXII, L.L.C. Accordingly, the Trustee hereby corrects this error by substituting the following to replace the information set forth on page A-26 of Exhibit A to the First Omnibus Objection:

<u>CREDITOR NAME</u>			
VESTAR CALIFORNIA XXII, L.L.C.			
<u>Claim No.</u>	<u>Case No.</u>		<u>Claim Amount</u>
78-1	15-bk-09385 (Frontier Star CJ, LLC)		\$214,937.62
<u>Objections to Claim</u>			<u>Disputed Amounts</u>
<u>Specific Objections:</u> Books and Records Objection (Section III.A.1.); Unsupported Claim Objection (Section III.A.2.); Non-Debtor Obligation Objection (Section III.A.10.) The claim is based on a lease between the creditor, as landlord, and MJKL Enterprises, LLC, as tenant. None of the Debtors is a party to the lease upon which this claim is based. Accordingly, the Trustee asserts a Non-Debtor Obligation Objection. Furthermore, the Debtors' business records do not support any claim against any of the Debtors for any obligations arising under the lease on which this claim is based, and the claim provides no information or documentation establishing that any Debtor is a party to the relevant lease or is otherwise obligated for any amounts owing thereunder. Accordingly, the Trustee asserts a Books and Records Objection and an Unsupported Claim Objection. Based on these objections, the claim should be disallowed in its entirety. NOTICE IS HEREBY GIVEN that, to the extent the creditor should establish or should the Court find that one or more of the Debtors is a party to the lease or is otherwise obligated for any amounts thereunder, the Trustee reserves its right to raise any and all applicable objections he may have to the amounts sought by the creditor under the lease.			\$214,937.62
<u>PROPOSED ALLOWED CLAIM AMOUNT (Claim Amount – Disputed Amounts)</u>			\$0.00 (disallow in full)

The only change made pursuant to this correction is to fix the creditor's name by replacing Vestar Arizona XXII, L.L.C. with Vestar California XXII, L.L.C.

RESPECTFULLY SUBMITTED this 20th day of September, 2017.

BRYAN CAVE LLP

By /s/ JAS, #026359

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